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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA, )  
13 Plaintiff, )  
14 v. ) 2:13-CR-439-KJD-(VCF)  
15 JAMES WARRAS, )  
16 Defendant. )

17 **GOVERNMENT'S UNOPPOSED MOTION TO EXTEND THE TIME TO REPLY TO**  
**WARRAS'S RESPONSE (ECF NO. 244) TO GOVERNMENT'S MOTION TO ENTER A**  
**PRELIMINARY ORDER OF FORFEITURE WITH A CRIMINAL FORFEITURE MONEY**  
**JUDGMENT OF \$4,920,000 (ECF NO. 235)**  
**(First Request)**

20 The United States of America respectfully moves this Court for an Order extending the time for  
21 the government to reply to Warras's Response (ECF No. 244) to the motion to enter preliminary order of  
22 forfeiture with a criminal forfeiture money judgment of \$4,920,000 (ECF No. 235). The deadline for  
23 replying to the Response is February 22, 2016. The government requests an extension of time to and  
24 including March 7, 2016.

25 The grounds for extending the time are as follows.

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The undersigned counsel contacted Raquel Lazo, counsel for Warras, who agreed to the extension of time. The undersigned has a large, active case load and, among other work, had civil seizure warrants signed and executed this week, two of which were banks that first refused to honor the federal court orders, requiring a full day to locate and to speak to the banks' contacts, who understood the significance of the federal court orders.

This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

This Court should grant an extension of time to, and including, March 7, 2016, for the United States to reply to Warras's response (ECF No. 244).

DATED: February 19, 2016.

DANIEL G. BOGDEN  
United States Attorney

/s/ Daniel D. Hollingsworth  
DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: February 23, 2016